

# FELONY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR THEFT  
FROM AN ORGANIZATION RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
KELLY A. THOMPSON	*	VIOLATION: 18 U.S.C. § 666(a)(1)(A)
	* * *	

The United States Attorney charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL TO THIS BILL OF INFORMATION:**

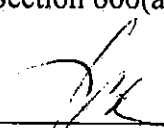
1. Langston Hughes Academy Charter School was an organization licensed and operated by NOLA 180, located in New Orleans, Louisiana. Langston Hughes Academy Charter School received federal assistance in excess of \$10,000 during the one year period beginning July 1, 2008 through on or about June 30, 2009 and again beginning July 1, 2009 through on or about June 30, 2010.


2. The defendant, **KELLY A. THOMPSON**, was employed by Langston Hughes Academy for a period of approximately 13 months beginning on or about July 1, 2008 to on or about November 6, 2009. The defendant was hired as the Business and Human Resources Manager/Financial Manager for Langston Hughes Academy Charter School. The defendant's duties included personnel, payroll, paying bills, applying for grants and handling school tax monies.

**B. THE THEFT:**

From on or about August 2008 and continuing through on or about November 2009, in the Eastern District of Louisiana and elsewhere, **KELLY A. THOMPSON**, the defendant herein, did intentionally embezzle, steal, obtain by fraud and otherwise without authority, convert to the use of the defendant, **KELLY A. THOMPSON**, a person other than the rightful owner, property valued in excess of approximately \$660,000 and owned by or under the care, custody, and control of the Langston Hughes Academy Charter School; that is the defendant made unauthorized cash withdrawals and then concealed the theft by making the unauthorized withdrawals appear as transactions with vendors including purchase transactions for textbooks. The defendant would then combine the fraudulent transactions and make a false entry into the school's computer system in order to conceal the theft from the schools internal auditors;

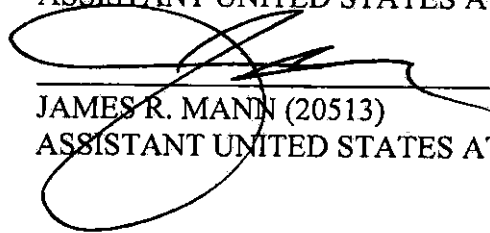
all in violation of Title 18, United States Code, Section 666(a)(1)(A).

  
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JIM LETTEN (8517)  
UNITED STATES ATTORNEY

  
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JAN MASELLIMANN (9020)  
FIRST ASSISTANT UNITED STATES ATTORNEY

  
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BRIAN M. KLEBBA  
ASSISTANT UNITED STATES ATTORNEY

  
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SALVADOR PERRICONE (10515)  
ASSISTANT UNITED STATES ATTORNEY

  
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JAMES R. MANN (20513)  
ASSISTANT UNITED STATES ATTORNEY

New Orleans, Louisiana  
January 29, 2010